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Attorneys for Defendants  
HANTLE, INC.  
WON GEE LEE  
MYUNG WON SUH

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

HYOSUNG (AMERICA), INC. and  
NAUTILUS HYOSUNG INC.

Petitioners,

v.

HANTLE, INC. (fka Hantle USA, Inc.),  
GENMEGA, INC. (fka Huin, Inc.), WON GEE  
LEE and MYUNG WON SUH,

Defendants.

Case No. CV-10-2160- SBA

**STIPULATION TO EXTEND  
TIME FOR DEFENDANT WON  
GEE LEE TO ANSWER OR  
OTHERWISE RESPOND TO THE  
SECOND AMENDED  
COMPLAINT**

Judge: Hon. Sandra B. Armstrong

STIPULATION TO EXTEND TIME FOR WON GEE LEE TO  
ANSWER OR RESPOND  
CASE No. CV-10-2160- SBA

1 WHEREAS, Defendant Won Gee Lee (“Mr. Lee”) is subject to a criminal indictment in  
2 the Republic of Korea;

3 WHEREAS, in light of the ongoing criminal proceeding in Korea, Mr. Lee plans to file a  
4 motion to stay the instant proceedings and/or a motion for a protective order in this matter;

5 WHEREAS, the parties have agreed to extend the time for Mr. Lee to answer Plaintiffs’  
6 Second Amended Complaint, subject to the conditions below;

7 NOW, THEREFORE, pursuant to Local Civil Rules 6-1(a), 7-1(a), and 7-12, all parties,  
8 by and through their respective counsel, hereby stipulate as follows:

- 9 1. The deadline for Mr. Lee to answer or otherwise respond to the Second Amended  
10 Complaint is extended to May 13, 2011.
- 11 2. Any motion to stay and/or motion for a protective order governing Mr. Lee and/or  
12 any of the other defendants based on the ongoing Korean criminal proceedings  
13 and/or the Fifth Amendment to the United States Constitution shall be filed no  
14 later than May 13, 2011, though this stipulation shall not preclude future motions  
15 for a stay or a protective order that may be based on new or changed circumstances  
16 and are not being relied on as a basis for the present extension;
- 17 3. Defendants shall meet and confer with Plaintiffs with respect to any such motion  
18 to stay and/or motion for a protective order before filing;
- 19 4. Plaintiffs shall file their opposition to any such motion to stay and/or motion for a  
20 protective order on or before June 3, 2011;
- 21 5. Defendant(s) shall file any reply within seven (7) days of the date that Plaintiffs  
22 file their opposition;
- 23 6. The parties jointly request that the Court issue a ruling on such motion to stay  
24 and/or motion for a protective order as soon as possible;
- 25 7. This stipulation shall not extend any other applicable deadline in the litigation; and
- 26 8. Mr. Lee and the other defendants shall participate in the Case Management  
27 Conference scheduled for May 25, 2011 and the ENE Conference scheduled for  
28 June 22, 2011, and shall not seek to postpone those events.

1 Dated: May 3, 2011

MATTHEW H. POPPE  
KRISTIN S. CORNUELLE  
JACOB A. SNOW  
ORRICK, HERRINGTON & SUTCLIFFE LLP

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3  
4 By: /s/ Matthew H. Poppe /s/  
Matthew H. Poppe

5 Attorneys for Defendants  
6 HANTLE, INC.  
WON GEE LEE  
7 MYUNG WON SUH

8 Dated: May 3, 2011

ADAM A. LEWIS  
GRANT L. KIM  
ALISON M. TUCHER  
BARBARA N. BARATH  
MORRISON & FOERSTER LLP

9  
10  
11 By: /s/ Grant L. Kim /s/ [as authorized]  
12 Grant L. Kim

13 Attorneys for Plaintiffs  
14 HYOSUNG (AMERICA), INC.  
NAUTILUS HYOSUNG, INC.

15 Dated: May 3, 2011

16 MICHAEL LI-MING WONG  
THAD A. DAVIS  
ROCKY C. TSAI  
17 ROPES & GRAY LLP

18  
19 By: /s/ Thad A. Davis /s/ [as authorized]  
20 Thad A. Davis

21 Attorneys for Defendant  
22 GENMEGA, INC.

23 ~~PROPOSED~~ ORDER

24 PURSUANT TO STIPULATION IT IS SO ORDERED.

25  
26 Dated: 5/6/11

By:   
United States District Court Judge